

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.
)
Plaintiff,) JUDGE
)
v.)
)
FUNDS IN THE AMOUNT OF \$23,110.82)
SEIZED PURSUANT TO THE EXECUTION OF)
A FEDERAL SEIZURE WARRANT FROM A)
CRYPTOCURRENCY ACCOUNT IN THE)
(FULL) NAME OF GUANGHUA ZHENG;)
USERNAME: zhengfujing@[redacted].cn,)
)
Defendant.) COMPLAINT IN FORFEITURE

NOW COMES plaintiff, the United States of America, by Justin E. Herdman, United States Attorney for the Northern District of Ohio, and James L. Morford, Assistant U.S. Attorney, and files this Complaint in Forfeiture, respectfully alleging as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

JURISDICTION AND INTRODUCTION

1. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. Section 1345, and over an action for forfeiture under 28 U.S.C. Section 1355(a). This Court also has jurisdiction over this particular action under 21 U.S.C. Section 881(a)(6) and 18 U.S.C Section 981(a)(1)(A).

2. This Court has *in rem* jurisdiction over the defendant property pursuant to: (i) 28 U.S.C. Section 1355(b)(1)(A) because acts giving rise to the forfeiture occurred in this district; (ii) 28 U.S.C. Section 1355(b)(1)(B), incorporating 28 U.S.C. Section 1395, because the defendant property, which was seized outside this district, has been brought into this district; and, (iii) 28 U.S.C. Section 1355(b)(1)(B), incorporating 21 U.S.C. Section 881(j) and 18 U.S.C. Section 981(h), because a criminal prosecution of the owner(s) of the defendant property has been brought in this district.

3. Venue is proper in this district pursuant to: (i) 28 U.S.C. Section 1355(b)(1)(A) because acts giving rise to the forfeiture occurred in this district; (ii) 28 U.S.C. Section 1395 because the defendant property, which was seized outside this district, has been brought into this district; and, (iii) 21 U.S.C. Section 881(j) and 18 U.S.C. Section 981(h) because a criminal prosecution of the owner(s) of the defendant property has been brought in this district.

4. This Court will have control over the defendant property through service of an arrest warrant *in rem*, which the United States Marshals Service will execute upon the defendant property. *See*, Supplemental Rule G(3)(b) and G(3)(c).

5. On or about August 21, 2018, Special Agents of the Drug Enforcement Administration (DEA) and Internal Revenue Service, Criminal Investigation (IRS–CI), seized the defendant funds in the amount of \$23,110.82 (the “defendant property”) from a cryptocurrency account described, in part, as follows: [Asian Cryptocurrency Exchange] account in the (full) name of GUANGHUA ZHENG; username: zhengfujing@[redacted].cn. The seizure was made pursuant to the execution of a federal seizure warrant. The defendant property is now in the custody of the United States Marshals Service.

6. The defendant property is subject to forfeiture to the United States under 21 U.S.C. Section 881(a)(6) in that it constitutes proceeds from illegal drug trafficking activities, and/or was used or was intended to be used in exchange for illegal controlled substances/illegal controlled substance analogues, and/or was used or was intended to be used to facilitate illegal drug trafficking activities.

7. The defendant property also is subject to forfeiture to the United States under 18 U.S.C. Section 981(a)(1)(A) in that it constitutes property involved in a transaction(s), or attempted transaction(s), in violation of 18 U.S.C. Section 1956 (money laundering), or is property traceable to such property.

DESCRIPTION OF THE DEFENDANT PROPERTY

8. The defendant property is more fully described as follows:

Funds in the amount of \$23,110.82 seized from a cryptocurrency account described as follows: [Asian Cryptocurrency Exchange] account in the (full) name of GUANGHUA ZHENG; Username: zhengfujing@[redacted].cn, Account Type: Individual, E-mail: zhengfujing@[redacted].cn, Status: Verified, Phone #: xxxx-xx-xxxx6175, ID: xxx415, Address: Room xxx, No. xx, Huochezhan Rd., Lane 118, Jiading, Shanghai, China 201802, Nationality: China. The cryptocurrency deposit address associated with this user is as follows: BITCOIN: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxF4uhiy (date created: 17-09-18).

FORFEITURE

I. *Background.*

9. From on or about January 1, 2008 to the present, in the Northern District of Ohio, the People's Republic of China and elsewhere, FUJING ZHENG (aka Gordon Jin, *et al.*), GUANGHUA ZHENG (the father of FUJING ZHENG) and others (the "ZHENG Drug Trafficking Organization") conspired to manufacture and distribute substances and mixtures containing a detectable amount of controlled substances and controlled substance analogues, as

defined in 21 U.S.C. § 802(32), intended for human consumption, as provided in 21 U.S.C. Section 813.

10. The ZHENG Drug Trafficking Organization created, maintained, and controlled companies in China whose purpose was to engage in drug trafficking, smuggling, and money laundering. The purpose of these companies was to act as a front, concealing the real identities of the individuals and companies engaged in the criminal enterprise.

11. The ZHENG Drug Trafficking Organization created, maintained, and controlled “Shanghai Pharmaceutical Company 1” in Shanghai, China. The purpose of Shanghai Pharmaceutical Company 1 was to act as the legitimate face of the drug trafficking organization and a location from which the co-conspirators created, manufactured, and prepared narcotics for mass distribution around the world. Shanghai Pharmaceutical Company 1 listed one of FUJING ZHENG’s email addresses as a point of contact on its website: gordonzheng@[redacted].com.

12. The ZHENG Drug Trafficking Organization touted its ability as a large-scale synthetic narcotics manufacturer to distribute “over 16 tonnes of chemicals every month” from “our own laboratory” and “synthesize nearly any chemical on a bespoke basis in any quantity.” The Organization primarily specialized in the production for mass distribution of three types of synthetic narcotics: opioids, including fentanyl, fentanyl analogues, and other synthetic opioids; cathinones (commonly referred to by terms such as “bath salts,” “flakka,” and “gravel”); and, synthetic cannabinoids (commonly referred to by terms such as “K2” and “Spice”). Many of these drugs are associated with overdose deaths. Some are associated with causing irreversible physiological damage from non-fatal overdoses.

13. Through chemical expertise, the ZHENG Drug Trafficking Organization manufactured new and oftentimes deadly analogues of synthetic opioids, pharmaceuticals,

cathinones, and other controlled substances. The Organization called this process “custom synthesis.” Throughout the course of the conspiracy, the Organization had manufactured and distributed over 250 types of synthetic narcotics.

14. The ZHENG Drug Trafficking Organization manufactured counterfeit pills for mass distribution from China into the United States and around the world, adulterating trademarked and other pharmaceuticals with synthetic narcotics, including those that had a reasonable probability of causing serious adverse health consequences or death.

15. The ZHENG Drug Trafficking Organization also created, maintained, and controlled foreign web sites as online storefronts for the controlled substances that the Organization created, manufactured, and distributed. These websites included www.globalrc.net, www.goldenrc.com, and www.TopLabRC.com. On these websites, the co-conspirators advertised the following:

- a.) Controlled substances and controlled substance analogues for sale, with the Organization’s website www.globalrc.net boasting that the Organization distributed over “16 tonnes a month” of illicit chemicals and had the ability to make “any quantity of desired chemicals for immediate distribution.”
- b.) Guaranteed delivery of products, including “100% deliver[y] and reshipment of products if package got seized by customs,” its ability to ship “worldwide to Australia, Europe, Asia, and Africa,” “special ways to [ship narcotics] to USA, Russia, Europe and other countries,” and “warehouses available in USA and Europe” for reshipment of controlled substances in the destination countries as a means of bypassing customs at the border.
- c.) “Custom Synthesis,” a process through which the ZHENG Drug Trafficking Organization used its chemical expertise to create “every possible chemical to meet the needs of [its] customers,” including “many other products than the ones [] found on [its] website.”
- d.) Secured lines of communication for customers to contact the Organization, including end-to-end encrypted platforms like WhatsApp and ProtonMail.

16. In order to maximize their global customer base, the ZHENG Drug Trafficking Organization regularly maintained and updated mirror websites of www.globalrc.net advertising their synthetic narcotics for sale in over 35 languages. These languages included Arabic, Bengali, Catalan, Croatian, Danish, Dutch, Estonian, Farsi, Finnish, French, Gaelic (Irish), Greek, Haitian Creole, Hebrew, Hindi, Hmong, Hungarian, Icelandic, Indonesian, Italian, Japanese, Korean, Lithuanian, Malay, Maltese, Norwegian, Polish, Portuguese, Romanian, Russian, Serbian, Slovenian, Spanish, Turkish, Ukrainian, Urdu, Uzbek, and Vietnamese.

17. The ZHENG Drug Trafficking Organization also created, maintained, and controlled vendor accounts on various foreign-hosted “trading” websites for the purpose of advertising and distributing controlled substances. These websites included EC21, TradeKey, China Quality Lighting, TradeIndia, and TradeLead.

18. The ZHENG Drug Trafficking Organization not only passively advertised to customers on these websites, but also actively solicited sales of controlled substances, including through sending private messages on the “trading” websites to individuals who it believed may be interested in purchasing narcotics.

19. The ZHENG Drug Trafficking Organization additionally communicated with current and prospective customers through email accounts. These included MagicChemical@hotmail.com, goldenchemical@live.com, 3507656950@qq.com, and Sales@globalrc.net. On these accounts, the Organization referred to the account user as “GORDON JIN.” The Organization also used WhatsApp, Skype, and other communication platforms to speak with its customers. When communicating with customers, the Organization consistently referred to itself in the plural as “we” and “us.”

20. FUJING ZHENG used the moniker “JINXINJIN” and ultimately “GORDON JIN” on the Organization’s websites, its vendor accounts, and various email accounts to advertise and communicate with customers. The ZHENG Drug Trafficking Organization also used the moniker “GORDON JIN” as a form of branding, letting customers know that they are buying from the same supplier despite a change in website, email account, or underlying company name.

21. The ZHENG Drug Trafficking Organization also made periodic updates to its websites and account pages as a means of mass communication to apprise customers of narcotics available for sale, order protocols, shipping issues, and business logistics.

22. The ZHENG Drug Trafficking Organization took numerous steps in an attempt to conceal its activities and the identities of its members from law enforcement. These steps included:

- a.) Communicating through secure private messaging, including ProtonMail, an end-to-end encrypted email service; WhatsApp, an end-to-end encrypted messaging service; and WeChat, a Chinese web communications platform that is beyond the reach of U.S. legal process.
- b.) Maintaining web sites and trade service accounts abroad and outside the reach of U.S. legal process.
- c.) Accessing the internet through Virtual Private Networks (VPNs).
- d.) Periodically changing its email addresses and front company names.
- e.) Using aliases such as “GORDON JIN” and “JINXINJIN.”
- f.) Utilizing front and shell companies in the United States, China, and around the world.
- g.) Incorporating its criminal organizations, such as Global United Biotechnology, in the British Virgin Islands (BVI) and other similar locations. BVI’s laws prevent the identification of owners, directors, and shareholders of companies incorporated in BVI and similarly forbid the disclosure of corporate tax and banking information.

23. From its base of operations in China, the ZHENG Drug Trafficking Organization communicated with drug customers, received drug proceeds, and/or shipped narcotics to over 25 countries, including the United States.

24. In the United States, specifically, the ZHENG Drug Trafficking Organization communicated with drug customers, received drug proceeds, and/or shipped narcotics to over 35 states, including Ohio.

25. The ZHENG Drug Trafficking Organization also maintained operations, corporate records, and/or financial holdings in the following countries: (i) The People's Republic of China (including Hong Kong), (ii) The British Virgin Islands, (iii) Japan, (iv) The Marshall Islands, (v) Poland, (vi) Tonga, (vii) The United Kingdom, and (viii) The United States.

26. The ZHENG Drug Trafficking Organization employed a variety of methods to smuggle or otherwise traffic narcotics from China to destination countries such as the United States. These methods included:

- a.) False manifesting of narcotics as non-controlled chemicals.
- b.) Using freight forwarders, thereby hiding that the Organization's companies were the origin point for the narcotics.
- c.) Concealing narcotics within bulk freight containing legal goods.
- d.) Using re-shippers in the destination countries.

27. One technique was to have co-conspirators form or otherwise use companies in the destination countries for the purpose of re-shipping narcotics within the destination country. The ZHENG Drug Trafficking Organization would ship bulk quantities of narcotics to the re-shipping companies, often through shell companies or freight forwarders in China. The re-shipping companies would receive the bulk shipments of narcotics, separate them into individual parcels for each narcotics customer, and then re-distribute the drugs within the destination

country. In doing so, the ZHENG Drug Trafficking Organization largely avoided detection by customs.

28. For instance, the ZHENG Drug Trafficking Organization used chemical companies run by its co-conspirator Bin Wang (aka Benjamin Wang, aka David King – indicted in N.D. Ohio Case No. 1:18-CR-123) in both China and the United States to smuggle narcotics past both countries' customs agents. These companies – Cambridge Chemicals, Wonda Science, OneChem, Daniel Lab, and ChemCloud – had separate articles of incorporation and/or offices in both the United States and China. The ZHENG Drug Trafficking Organization had its narcotics shipments hidden within bulk freight shipments sent between the Chinese and United States' offices of these chemical companies. Employees at these companies created false manifests for these narcotics or otherwise hid them in the bulk chemical shipments.

29. The ZHENG Drug Trafficking Organization maintained properties in the United States for the purpose of distributing controlled substances. These properties included the office address of Cambridge Chemicals, Wonda Science, OneChem, and ChemCloud in the United States: 5 Walnut Hill Park, Unit 13 in Woburn, Massachusetts.

30. The ZHENG Drug Trafficking Organization laundered its criminal proceeds through a variety of means. These laundering techniques included:

- a.) Utilized digital currency (such as Bitcoin) to conceal and disguise the nature, location, source, ownership and control of the drug proceeds.
- b.) Maintained and controlled digital currency addresses that were used by drug traffickers and co-conspirators to make payments for narcotics.
- c.) Utilized digital currency exchanges to convert cryptocurrency drug trafficking proceeds into official fiat currency.
- d.) Misrepresented fund transfers and directed customers to misrepresent fund transfers in order to conceal and disguise the nature, location, source, ownership and control of the drug proceeds.

- e.) Structured transactions to avoid financial institution reporting and recordkeeping requirements.
- f.) Transmitted drug proceeds into and out of bank accounts in Hong Kong and elsewhere, with the purpose of obfuscating the nature of the proceeds.
- g.) Bypassed Chinese restrictions and reporting requirements on fiat currency entering and leaving the People's Republic of China through the use of co-conspirators who received drug payments through money transmitting businesses (including "Money Transfer Company 1", "Money Transfer Company 2", OKPay, and Skrill) on behalf of FUJING ZHENG, GUANGHUA ZHENG and other members of the conspiracy. These co-conspirators include Guangfu Z., Guifeng C., Songyan J., Longbao Z., and others.

31. The People's Republic of China imposed strict identification laws for monetary transfers and transmissions, particularly those going into and out of its country. These laws required FUJING ZHENG and GUANGHUA ZHENG to provide their real identities from time to time when straw recipients were unavailable. The ZHENG Drug Trafficking Organization later instructed drug traffickers and co-conspirators to pay them in cryptocurrencies, and acquired accounts with numerous cryptocurrency exchanges outside of China to exchange cryptocurrencies into fiat currency like the U.S. dollar. These exchanges, however, had strict Know Your Customer legal requirements, forcing both FUJING ZHENG and GUANGHUA ZHENG to provide their real identities, including their Chinese passports, in order to use their services.

32. FUJING ZHENG and GUANGHUA ZHENG managed and controlled the ZHENG Drug Trafficking Organization. Each had largely separate roles within the conspiracy.

33. FUJING ZHENG managed and controlled Shanghai Pharmaceutical Company 1 and used its facilities for manufacturing and producing the synthetic narcotics that the ZHENG Drug Trafficking Organization distributed around the world. In this role, he primarily used the alias "GORDON ZHENG" and the email address gordonzheng@[redacted].com. FUJING

ZHENG also managed foreign trading and customer relations for the Organization's global network of drug trafficking clients and co-conspirators. In this role, he primarily used the alias "GORDON JIN." As GORDON JIN, FUJING ZHENG used email addresses such as MagicChemicals@hotmail.com, goldenchemical@live.com, sales@globalrc.com, as well as WhatsApp, QQ, WeChat, and China-based telephone numbers to communicate with drug traffickers. FUJING ZHENG additionally handled negotiations with third party re-shippers, which the Organization used to mask its connection to the narcotics packages in case law enforcement or customs intercepted the drug parcels. When interacting with co-conspirators handling re-shipments, FUJING ZHENG often used the aliases "MR. JIN" or "DENG GAO."

34. GUANGHUA ZHENG, FUJING ZHENG's father, managed the financial and money laundering side of the ZHENG Drug Trafficking Organization. GUANGHUA ZHENG used various bank accounts around the world, and particularly in Hong Kong, to launder drug proceeds. The Organization also ensured that drug traffickers were instructed to misstate the purpose of drug payments to the ZHENG Drug Trafficking Organization for wire transfers and money orders. For example, the drug traffickers were instructed to state that the purpose of the wire transfers was for "tuition" or "family maintenance." In doing so, GUANGHUA ZHENG's financial transactions violated financial reporting requirements in China and numerous destination countries. GUANGHUA ZHENG additionally used cryptocurrencies such as Bitcoin and cryptocurrency exchangers to launder drug proceeds.

II. Particular Acts in Furtherance of the Conspiracy.

35. On April 8, 2009, the ZHENG Drug Trafficking Organization posted advertisements for controlled substances and controlled substance analogues, such as Methedrone, 4-FMP, MDPV, and Butylone on its website www.globalrc.net. Under "Privacy

Notice,” the Organization stated, “GlobalRC stores only the information provided by the customers that render the delivery possible of purchased merchandise. All information provided is stored on secure servers.” Under “Shipping and Returns,” the Organization stated, “GlobalRC delivers worldwide. All products are packed in discreet unmarked envelopes and sent by mail.” The website had versions for multiple languages, including English, German, and Spanish.

36. On or about June 3, 2011, the ZHENG Drug Trafficking Organization distributed approximately two kilograms of methedrone, a Schedule I controlled substance, that was sent to a drug trafficker in Minnesota.

37. On February 29, 2012, an American drug trafficker emailed the ZHENG Drug Trafficking Organization’s email account MagicChemical@hotmail.com, requesting \$4,000.00 worth of narcotics. The Organization responded using the “JINXINJIN” moniker on MagicChemical@hotmail.com, “We ship big quantity to US each month, we have a lot of experience in it [. . .] we guarantee delivery, in case seized by customs, we re-ship free, OK?” The Organization also provided its expertise on how best to bypass customs, advising, “[i]f you have address in Eastern US state, that would be best, cos New York customs is easiest to pass.”

38. On August 1, 2012, the ZHENG Drug Trafficking Organization distributed kilogram amounts of 4-MEC, a Schedule I controlled substance, to a drug trafficker operating in and around Austin, Texas. The ZHENG Drug Trafficking Organization initially communicated with the drug traffickers through its vendor accounts on tradekey.com and EC21.com.

39. On March 2, 2013, the ZHENG Drug Trafficking Organization distributed approximately 2.5 kilograms of Methylone to a drug trafficker in Minnesota using the email account MagicChemical@hotmail.com. The Organization instructed the drug trafficker to structure its payments to avoid reporting requirements in Money Transfer Company 1, asking

“can you divide into [Money Transfer Company 1] money? For example, $5,875 = 2900 + 2975$. Do not exceed 3000 USD.” Under federal law, financial institutions have recordkeeping requirements for all transactions in the amount of \$3,000.00 or more.

40. On March 8, 2013, the ZHENG Drug Trafficking Organization used the email account MagicChemical@hotmail.com to provide the following bank account information to undercover law enforcement ordering 4-MEC:

Beneficiary Name: Global United Biotechnology Inc.
Account Number: 787-xxxxxx-883
Beneficiary Bank Name: Hang Seng Bank Limited
Beneficiary Bank Address: 83 Des Voeux Road Central, Hong Kong
Chips No.: xxx522
Swift Code: xxxxxKHH
Company Address: Quastisky Building, P.O. Box 4389, Road Town, Tortola, British Virgin Islands

41. On or about March 16 and 25, 2013, the ZHENG Drug Trafficking Organization distributed approximately 12 kilograms of 4-MEC that were sent to multiple addresses in the United Kingdom.

42. On March 26, 2013, the ZHENG Drug Trafficking Organization used its email account MagicChemical@hotmail.com to respond to a drug trafficker expressing concern about customs intercepting the drug packages containing three kilograms of Methylone. The Organization explained that it will mislabel the products to reduce the chance that customs will inspect it, falsely labeling the contents of three drug parcels as “sebacic acid,” “hydrogen peroxide resin,” and “azelaic acid,” respectively.

43. On or about April 11, 2013, the ZHENG Drug Trafficking Organization distributed approximately two packages each containing one kilogram of Methylone that were sent to two addresses in the greater London area in the United Kingdom.

44. After the United Kingdom apprehended its UK-based co-conspirators, the ZHENG Drug Trafficking Organization changed some of its communication methods, including changing its email address to goldenchemical@live.com, its website to www.goldenrc.com, and its Skype address to GordonJinChina.

45. On April 11, 2014, the ZHENG Drug Trafficking Organization posted the following statement on its new website, www.goldenrc.com: “We are professional Pentylone manufacturer in China, a lot of US and Europe customers purchase big quantity from us monthly. All chemicals we sell are best quality and competitive price. Generally, we will ship by DHL UPS Fedex or EMS, special way to USA and Russia, we guarantee package can pass your customs.” It also listed 19 other synthetic drugs that the Organization professionally manufactured and had available for immediate sale.

46. On July 3, 2014, FUJING ZHENG sent an email from his personal email account, zhengfujing@[redacted].cn, to the ZHENG Drug Trafficking Organization’s email address goldenchemical@live.com. In that email, FUJING ZHENG attached an excel spreadsheet containing a drug ledger that listed some of the Organization’s drug sales in the last few months. The ledger included the customer email address, date of drug distribution, type of drug, and amount paid in U.S. dollars.

47. On November 14, 2014, undercover law enforcement received an email from the ZHENG Drug Trafficking Organization via goldenchemical@live.com explaining that the Organization has experience in international drug trafficking and smuggling dating back to at least 2008:

We are professional Methylone crystal manufacturer in China, our products are all best quality, pic of merchandise is in the attachment, a lot of US and Europe customers purchase largely from us every month. We are trade pro+ member of ec21 since 2008,

our business license and all informations [sic] are verified by ec21. Pls browse our webs: www.goldenrc.com & goldenrc2008.en.ec21.com.

Generally, we ship merchandise by EMS and special way to USA, we have a lot of experience in shipping, we use aluminum foil bag to wrap, we will declare it as other chemical name, and we will offer a series of certificates, packages we sent can go through customs safely, we guarantee package can pass customs, in case seized by customs, we re-ship free.

Generally, payment we accept is wire transfer to our company bank account. Besides, we also can accept [Money Transfer Company 1].

Pls tell me how many quantity of Methylone you wanna buy? Do you wanna have a sample order?

Regards,

Gordon
www.goldenrc.com

48. On December 18, 2014, the ZHENG Drug Trafficking Organization posted over 45 narcotics for sale on its EC21 vendor page, listing Global United Biotechnology as the underlying company and "GORDON JIN" as the point of contact.

49. On January 31, 2015, the ZHENG Drug Trafficking Organization used its email account goldenchemical@live.com to respond to a drug trafficker seeking bulk shipments of A-PVP:

OK, I will ship 2.4kg a-pvp pink crystal to the address. The package of EA091757251CN with 1.425kg ethylone yellow crystal get seized by customs, we will reship 1.425kg to you, still ship to the original address below:

Recipient name: [redacted]
Add: [redacted] Jacksonville, FL 32208 USA
Tel: [redacted] 5592

Right?

Regards,

Gordon
www.goldenrc.com

50. The ZHENG Drug Trafficking Organization distributed these narcotics shortly thereafter.

51. On February 15, 2015, Leroy S., a drug trafficker operating in the Northern District of Ohio, emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com with the subject, "Acetylfentanyl." In the email, Leroy S. stated, "to whom it may concern I would like to purchase Acetylfentanyl. if possible can you send me prices as well as information on where I can send the money too [sic]. I also would like to no [sic] how long would it take to receive if I purchased Monday."

52. On February 16, 2015, the ZHENG Drug Trafficking Organization responded to Leroy S. using the email account goldenchemical@live.com:

Dear Sir

We are professional acetylfentanyl manufacturer in China, our products are all best quality, a lot of US and Europe customers purchase largely from us every month. Our web is www.goldenrc.com

Price of 1kg acetylfentanyl is \$6,800 USD, pls be noted that the price we offer including shipping cost.

Generally, payment we accept is wire transfer to our company bank account. Besides, we also can accept [Money Transfer Company 1] and skrill (www.skrill.com).

Pls tell me how many quantity you wanna buy? Do you wanna have a sample order? Where are you from?

Regards,

Gordon
www.goldenrc.com

53. On February 17, 2015, after Leroy S. stated that he wanted to buy acetyl fentanyl but had concerns about the pricing and potential for law enforcement seizure, the ZHENG Drug Trafficking Organization responded using the email account goldenchemical@live.com:

500g-----\$3,500 USD

100g-----\$860 USD

Generally, we ship merchandise by EMS and special way to USA, we have a lot of experience in shipping, we use aluminum foil bag to wrap, we will declare it as other chemical name, and we will offer a series of certificates, packages we sent can go through customs safely, we guarantee package can pass customs, in case seized by customs, we re-ship free, our service is best.

If you buy 1[kilo], we will divide into 2 packages to ship.

When will you order it? Do you wanna buy 100g or 500g? How do you transfer money?

Regards,

Gordon

www.goldenrc.com

54. On February 18, 2015, Leroy S. responded via email, stating, "I want to place my order on or about the 23rd i would prefer the kg to be split sseparatly [sic] but can you please send me the info to ship it too i prefer [Money Transfer Company 1] but. If u no better let me no [know]."

55. On February 25, 2015, Leroy S. emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com:

im going to send [Money Transfer Company 1] tranfers [sic] today for 500 grams i would like my oder [sic] split 250/250 to 2 diffrent [sic] addresses due to [Money Transfer Company 1]. wanting more identification. over 2999 ill probably do 2600 and 800 is that ok with you. and though 250 seems like a lot [sic] to mail at one time but if its better to do 100 at a time let me no but once i receive [sic] tracking i will place another order for 500.

56. The next day, the Organization responded, "Ok, 250/250 to 2 different addreses [sic] is OK. 2600 and 800 is also OK."

57. On March 2, 2015, the ZHENG Drug Trafficking Organization advertised that it is a "professional" narcotics manufacturer in China on its website www.goldenrc.com. It guaranteed that it had the means of bypassing customs in foreign countries: "... a lot of US and

Europe customers purchase big quantity from us monthly. All chemicals we sell are best quality and competitive price. Generally, we will ship by EMS DHL Fedex or UPS, special way to Russia, UK and USA, we guarantee package can pass customs.” The Organization also advertised that “if you want new products, we can make it for you[] and keep secret.”

58. On March 13, 2015, the ZHENG Drug Trafficking Organization responded to Leroy S. using the email account goldenchemical@live.com, “I know you’ve already received packages [of acetyl fentanyl], is everything OK?” The next day, Leroy S. responded,

I just did a transfer to you for \$900.00 im going to do a larger transaction tommorow [sic] and another one monday it will be for 500grams that i want sent to 4 addresses the mtn for the 900 is xxx-xxx-0092 from [redacted] jackson please email me to let me no [sic] the price you will offer me. I will send addresses once you recieve [sic] my payments

59. On March 15, 2015, the ZHENG Drug Trafficking Organization emailed Leroy S. using the goldenchemical@live.com email account, “Price of 500g acetylfentanyl is \$3,500 USD, when will you transfer \$2,600 USD left. Sending to 4 different addresses is OK for us. Pls tell me which name you transfer to? FUJING ZHENG?”

60. On March 16, 2015, after Leroy S. indicated that he had the wrong name for the Money Transfer Company 1 transfer for the acetyl fentanyl payment, the ZHENG Drug Trafficking Organization emailed Leroy S. using the goldenchemical@live.com email account, stating (emphasis in original):

Our [Money Transfer Company 1] name is **FUJING ZHENG**, our [Money Transfer Company 1] informations [sic] are below:

First name: FUJING
Last name: ZHENG
Country: China

Price of 500g of acetylfentanyl is \$3,600 USD, cost of acetylfentanyl is very high, my friend, your profit is higher too much than us, our product's quality is best.

61. On March 17, 2015, Leroy S. emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com, explaining that he got his refund from another vendor and will send the money the following day. After Leroy S. sent the funds to FUJING ZHENG, the Organization distributed the acetyl fentanyl.

62. The ZHENG Drug Trafficking Organization's distribution of acetyl fentanyl, a controlled substance analogue of fentanyl, to Leroy S. resulted in the death of T.R., an individual in Akron, Ohio, on or about March 21, 2015.

63. The ZHENG Drug Trafficking Organization's distribution of acetyl fentanyl, a controlled substance analogue of fentanyl, to Leroy S. also resulted in the death of C.D., an individual in Akron, Ohio, on or about March 28, 2015.

64. On May 29, 2015, Ohio law enforcement, acting in an undercover capacity, emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com through an undercover email account, expressing an interest in purchasing a "large amount" of acetyl fentanyl. The Organization responded on May 30, 2015:

We are professional acetylfentanyl manufacturer in China, our products are all best quality, a lot of US and Europe customers purchase largely from us every month. Our web is www.goldenrc.com

Generally, we ship merchandise by EMS and special way to USA, we have a lot of experience in shipping, we use aluminum foil bag to wrap, we will declare it as other chemical name, and we will offer a series of certificates, packages we sent can go through customs safely, we guarantee package can pass customs, in case seized by customs, we re-ship free. Our service is best.

Generally, payments we accept are Bitcoin, bank wire transfer, [Money Transfer Company 1], [Money Transfer Company 2]. Pls tell me how many quantity you wanna buy from us? Do you wanna have a sample order?

Regards,

Gordon
www.goldenrc.com

65. On May 30, 2015, undercover local law enforcement in the Northern District of Ohio emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com:

Dear Gordon,

I am interested in purchasing 10 grams of acetylfentanyl. Upon arrival if the quality is to our standards I anticipate making larger purchases from you in the future. Please email me the price for 10 grams and [Money Transfer Company 1] information.

66. On May 31, 2015, the ZHENG Drug Trafficking Organization responded to law enforcement using the goldenchemical@live.com email account:

cost of 10g sample is \$150 USD, our [Money Transfer Company 1] informations are below:

First name: Guangfu
Last name: Z[redacted]
Country: China

Pls tell me MTCN, 100% right sender's name (first name.last name), amount and country after you transfer money.

Pls also tell me 100% right and detailed address, recipient name and telephone number for shipping.

Regards,

Gordon
www.goldenrc.com

67. On June 5, 2015, the ZHENG Drug Trafficking Organization distributed 10 grams of acetyl fentanyl to the undercover local law enforcement, with it arriving in the Northern District of Ohio on June 15, 2015.

68. On July 1, 2015, the ZHENG Drug Trafficking Organization advertised on its website www.goldenrc.com that it is a “professional chemical manufacturer in China” and that “a lot of US and European customers purchase huge quantity from us monthly.” The Organization listed over 40 narcotics for sale, in addition to its custom synthesis. It noted that

for all parcels going to “USA, Russia and European countries, we guarantee package can pass customs.” It also stated that it accepted payment in Bitcoins.

69. On August 14, 2015, the ZHENG Drug Trafficking Organization distributed narcotics to a drug trafficker operating in Denver, Colorado. The Organization instructed the drug re-distributor to send money to the following individuals for the narcotics sales:

GUANGHUA ZHENG ([redacted]/55); China Identification Number [redacted]1616;
ROOM 503 NO 168 CAO YANG ER CUN PUTUO ROOM 503 NO 168 CAO YANG
ER CUN PUTUO, Shanghai, China.

Guifeng C[redacted], China Identification Number [redacted]; ROOM503 NO 168
CAOYANGERCUN SHANGHAI ROOM 503 NO 168 CAOYANGERCUN
SHANGHAI, Shanghai, China

The drug parcel also contained a piece of paper with the following payment information:

ZHENG FUJING
China Merchants Bank
Hong Kong Branch
[redacted]6721
[redacted]KHH
21/F. Bank of America Tower, 12 Harcourt RD
Central Hong Kong, China

70. On October 6, 2015, the ZHENG Drug Trafficking Organization posted a blog on BlogSpot under the username “GORDON JIN” entitled, “BK-MDEA | MDEA | Sell BK-MDEA | Sell MDEA | Buy BK-MDEA.” BK-MDEA is a Schedule I controlled substance. In the post, the Organization explained that “Global United Biotechnology Inc. is a leading pharmaceutical company. Located in Shanghai and Jiangsu province [and] registered in British Virgin Islands.” It then explained that BK-MDEA is “a stimulant, and psychedelic of the phenethylamine, amphetamine” that “has same effects like MDMA.” Noting the chemical’s strength, the ZHENG Drug Trafficking Organization stated, “[i]n recent times, the chemical has been studied in death

case investigations.” It then linked to the website globalrc.com, inviting readers to “please visit our website today.”

71. On November 7, 2015, the ZHENG Drug Trafficking Organization advertised on its website www.goldenrc.com the sale of over a dozen chemicals, listing goldenchemical@live.com as the contact email address and GordonJinChina as the Skype address.

72. On November 23, 2015, the ZHENG Drug Trafficking Organization posted on its website www.goldenrc.com, “We are professional AMB-FUBINACA manufacturer in China, a lot of US and European customers purchase big quantity from us monthly. All chemicals we sell are best quality. Generally, we will ship chemicals by EMS DHL Fedex or UPS, special way to USA, Russia and European countries, we guarantee package can pass customs.” The Organization stated that, if customs somehow seized the items, “we will reship free.” Payment options included, “[Money Transfer Company 1], Bank wire transfer, Bitcoin and [Money Transfer Company 2].” It also explained, “[i]f you want new products, we can do custom synthesis for you and keep secret.” The Organization listed over a dozen other drugs that it professionally manufactured in China.

73. On December 6, 2015, FUJING ZHENG sent a test email from GordonZheng@[redacted].com – an email account affiliated with his front company, Shanghai Pharmaceutical Company 1 – to zhengfujing@[redacted].cn, his personal email account.

74. On or about December 7, 2015, the ZHENG Drug Trafficking Organization posted an advertisement on one of its EC21 vendor pages, stating that it delivers “to all 50 USA states” and “also ship[s] worldwide to Australia, Europe, Asia, and Africa.”

75. On March 29, 2016, FUJING ZHENG received a contract for services relating to his front company, Shanghai Pharmaceutical Company 1, at his personal email account, zhengfujing@[redacted].cn.

76. On June 15, 2016, the ZHENG Drug Trafficking Organization distributed over 800 grams of U-47700 ("pink heroin") that was being sent to a drug trafficker in Washington. The Organization attempted to smuggle the narcotics in parcels sent from Cambridge Chemicals' office in China.

77. On June 6, 2016, the ZHENG Drug Trafficking Organization emailed a Russian drug trafficker operating in and around Vladivostok City, Russia using its goldenchemical@live.com email account. In the email, the Organization explained how it circumvents China's ban on certain chemicals by creating "legal substitutes":

Since 1.Oct 2015, a lot of chemical have been banned in China, now we can offer their legal substitutes, their effect and potency are almost as before, they all have good feedback, we sell them in big quantity every month now, prices are almost as before, they are below:

Substitutes of ethylone and Methylone are Dibutylone(crystal), bk-ebdp(crystal), thirtylone(crystal)

Substitutes of alpha-PVP are 4F-PHP(crystal), th-PVP(crystal), MPHP(crystal)

Substitutes of ab-fubinaca are FUB-AMB(powder), adb-fubinaca(powder)

Substitutes of ab-chminaca are adb-chminaca(powder), mmb-chminaca(powder)

Substitutes of MAM-2201 are 5F-NNE1(powder), NM-2201(powder)

Substitutes of acetylfentanyl are 4-fluoroisobutyrfentanyl(powder), furanylfentanyl(powder)

Substitutes of 4-cec and 3-cec are 2-nmc(crystal), 4-cec(crystal)

Substitute of 5-MAPB is 6-EAPB(powder)

Substitute of pentedrone is 4-Methylpentedrone(crystal)

Substitutes of ethylphenidate are dimethylphenidate(crystal&powder), isopropylphenidate(powder)

Pls browse our web to know more details about them. If you are interested [in] them, we can offer samples.

Now we have better customized shipping way to your country compared to last year, packages we sent can go through customs safely, we will reship free in case package get seized by customs, our service is best.

Besides, we also can offer custom synthesis service now, you just offer CAS number, IUPAC or picture of chemical structure to us.

If you have anything else about the business, pls feel free to contact us.

Regards,

Gordon
www.goldenrc.com

78. On June 27, 2016, the ZHENG Drug Trafficking Organization emailed a customer requesting a quote for a fentanyl analogue, stating, "10g sample of 4-fluoroisobutyrfentanyl is \$100 USD, when will you order? How do you pay?"

79. On August 26, 2016, undercover law enforcement inquired on the website www.ec21.com, requesting a reliable supplier of "RC" with "good purity and discreet shipping." RC is shorthand for "research chemicals," coded language referring to synthetic narcotics. That same day, "GORDON JIN" responded using the email account goldenchemical@live.com, stating:

We are professional research chemicals manufacturer in China, our products are all best quality, a lot of US and European customers purchase largely from us every month. Pls tell me which products you wanna buy?

Regards,

Gordon
www.goldenrc.com

80. On September 4, 2016, the ZHENG Drug Trafficking Organization responded using goldenchemical@live.com to a drug customer in Florida ordering 4FPHP and MPBP, stating,

I give you another name to transfer by [Money Transfer Company 1], it's below:

First name: FUJING

Last name: ZHENG

Country: CHINA

81. On September 8, 2016, a drug trafficker emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com, asking why there was a significant delay in the narcotics shipment. The Organization responded the next day, explaining that they “color” the narcotics chemicals, thereby tricking Chinese officials and making it “easier to pass customs.”

82. On September 13, 2016, the ZHENG Drug Trafficking Organization responded using goldenchemical@live.com to a drug trafficker in Poland seeking 20 kilograms of narcotics. The Organization provided payment information for the transaction.

83. On September 13, 2016, the ZHENG Drug Trafficking Organization used goldenchemical@live.com to email a drug distributor, stating, “It's [sic] showed that U-47700 is delivered online, but you told me that it's [sic] get caught by police, pls tell me your thinking how to deal with it.” After the drug distributor told the Organization that he “won't risk my freedom trying to get it,” and the Organization agreed to re-ship it a different way, the customer confirmed that he sent the payment for the narcotics to “GUANGHUA ZHENG” with additional identifiers via Money Transfer Company 2.

84. On September 15, 2016, the ZHENG Drug Trafficking Organization discussed bulk shipment of narcotics with a drug trafficker in Singapore.

85. On September 16, 2016, the ZHENG Drug Trafficking Organization distributed ADB-FUBINACA to a drug trafficker operating in Russia after receiving payment in Bitcoin.

86. On September 16, 2016, the ZHENG Drug Trafficking Organization distributed MMC to a drug trafficker operating in the United Kingdom after receiving payment in Bitcoin.

87. On September 18, 2016, the ZHENG Drug Trafficking Organization provided a Nuclear Magnetic Resonance Spectroscopy (NMR) – an expert analytical examination to confirm the purity of a drug - to a drug trafficker to demonstrate the purity and quality of the MPHP that he was purchasing.

88. On November 21, 2016, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com, using Chemical Abstracts Service (CAS) numbers as code for narcotics:

To Gordon

We recently settled accounts and parted ways with our former supplier for CAS 59708-52-0 [Carfentanil] and 3258-84-2 [Acetyl Fentanyl] due to purity and reliability issues. We have an urgent need to resume service as quickly as possible. Do you have CAS 59708-52-0, 3258-84-2 or even 121348-98-9 [U-47700] in stock? Please let us know

89. The Organization responded the same day, stating:

59708-52-0 is carfentanyl, if we synthesize it for you, how many quantity you will buy? 3258-84-2 is acetylfentanyl, it's banned in China, we don't offer it. 121348-98-9 is U-47700, we can offer it, how many quantity you wanna buy?

Regards,

Gordon
www.goldenrc.com

90. From November 30 to December 7, 2016, the ZHENG Drug Trafficking Organization discussed pricing, shipping, and terms with undercover law enforcement, ultimately deciding on a purchase of U-47700. When undercover law enforcement asked for

payment information, the Organization provided GUANGHUA ZHENG's name as the recipient of the drug money:

Our [Money Transfer Company 2] information are below:

First name: GUANGHUA

Last name: ZHENG

Country: China

91. On December 16, 2016, undercover law enforcement asked for the tracking information for the parcel containing the U-47700 shipment. The ZHENG Drug Trafficking Organization responded, "We ship package to warehouse in USA at first, then ship to you by FedEx" and provided the FedEx tracking number. The Organization was referring to Bin Wang's warehouse in Woburn, Massachusetts. The ZHENG Drug Trafficking Organization used Bin Wang's companies – including Cambridge Chemicals, Wonda Science, OneChem, Daniel Lab, and ChemCloud – to smuggle narcotics into the United States and distribute them within the country.

92. On December 20, 2016, undercover law enforcement retrieved the parcel containing U-47700. The Organization shipped the U-47700 in such a way that it appeared that it was a purely U.S. domestic shipment sent from Cambridge Chemicals at 5 Walnut Hill Park, Unit 13, Woburn, Massachusetts 01801.

93. On January 2, 2017, a Florida drug trafficker expressed concern to the ZHENG Drug Trafficking Organization that customs was increasingly seizing its drug parcels. The Organization responded using goldenchemical@live.com that it would no longer be a concern; namely, the Organization explained that it used Bin Wang's companies in the Boston area to re-ship drugs in order to limit customs' interdiction and protect customers' information:

Now we have a new shipping way, package is sent to a warehouse in Boston at first, then shipping to you by FedEx, it's safer, we will offer your address after package arrived in

Boston. In case package get seized by customs, we will not offer your address to shipping company, nobody can find you, it also can be waive signature if you operate online, pls see pic below, is this OK with you?

94. On January 10, 2017, Bin Wang, Qinghua Y. (aka Jason Yen), Lynn X., and other employees of Wang's companies communicated over the WeChat communication platform regarding the ZHENG Drug Trafficking Organization's parcels. After reviewing the large numbers of customers receiving bulk chemical shipments from the ZHENG Drug Trafficking Organization, Wang expressly informed his employees that these parcel deliveries were "very risky" for them as they were "prohibited by law."

95. On January 18, 2017, undercover law enforcement contacted FUJING ZHENG at goldenchemical@live.com, asking for a list of their available products. That same day, FUJING ZHENG responded:

My friend, besides U-47700, during these time our hot sale products are 2-NMC, 4-CEC, Hexen, Ephylone, 4F-PHP, 3-FPM, MPHP, 4-CL-PVP, Dibutylone and 4-methylpentedrone, FUB-AMB, ADB-FUBINACA, 5F-MDMB-2201, MMB-CHIMINACA, 5F-ADB, eitzolam and 25I-NBOH. Which products are you interested?

Regards, Gordon
www.goldenrc.com
whats app +86 18117528156

96. On January 23, 2017, law enforcement purchased 50 grams of 4-CL-PVP, an analogue of Schedule I controlled substance a-pvp ("flakka"), from the ZHENG Drug Trafficking Organization at goldenchemical@live.com to be sent to Ohio. On January 24, 2017, JIN responded with payment information:

Our [Money Transfer Company 1] information are below:

First name: Longbao
Last name: Z[redacted]
Country: China

These information are enough to transfer money for you.

Public holiday of China spring festival already begin, it's the most important festival in China, just like Christmas in USA, so we ship at about 6th Feb., is this OK with you?

Regards,

Gordon
www.goldenrc.com
whatsapp +86 18117528156

97. The Organization distributed the 4-CL-PVP shortly afterward around February 15, 2017, through Bin Wang's front companies.

98. On February 12, 2017, Bin Wang, Qinghua Y., Lynn X., and other employees of Wang's companies communicated over a group WeChat regarding the ZHENG Drug Trafficking Organization's parcels. Lynn X. explained that the Organization's "red powder dyes are all hazardous; I don't care to submit them for testing." "Red powder dyes" and "hazardous chemicals" were code for controlled substances. "Testing" referred to submitting the chemicals to Chinese customs to chemical analysis, which would have revealed the chemicals' true nature as narcotics. Lynn X. proposed a solution involving smuggling narcotics underneath legal chemicals: "Why don't I just take a risk this time? I'll send the red one along with 750 grams of the whitish one, and I'll place the red one underneath." In response, Bin Wang suggested smuggling them in certain types of bottles. Lynn X. responded that this was not possible due to their size. Bin Wang replied that from now on they will instead "use a foil bag" and "heat seal it and mark it as nitrogen sealed on the label." Certain chemicals are transported in nitrogen sealed containers. For these chemicals, opening a nitrogen sealed bag would render them inert and thus valueless. Qinghua Y. responded to Wang's suggestion, "Yes. This way, they won't check it." After discussing how to accomplish this new packaging method, Lynn X. stated, "Let Mr. JIN pack it in a bottle." Qinghua Y. replied, "Tell him at a later time." Lynn X. concluded the conversation discussing how to mislabel the narcotics, reminding the others that "previously Mr.

JIN's dark-red colored product was sent out as Portland cement," referring to the term they previously used to mislabel types of narcotics for the Organization.

99. On March 7, 2017, undercover law enforcement inquired about purchasing Dibutylone, a Schedule I controlled substance, for re-distribution in Ohio. The ZHENG Drug Trafficking Organization responded using goldenchemical@live.com:

[CAS number] 17763-12-1 is Dibutylone, 1kg is \$1,300 USD including shipping cost to USA, we will reship in case package get seized by customs, when will you order? Do you pay by bitcoin, [Money Transfer Company 2], bank wire or [Money Transfer Company 1] this time?

Please send reply to our new email later, it's sales@globalrc.net.

Regards,

Gordon
www.globalrc.net
whatsapp +86 18117528156

100. Around this time, the Organization began recommending that its customers communicate with it through its sales@globalrc.net email account, which was hosted by ProtonMail in Switzerland. ProtonMail is an end-to-end encrypted email service. The Organization increasingly pressured its customers to contact it using this end-to-end encrypted account going forward.

101. On March 8, 2017, the ZHENG Drug Trafficking Organization emailed undercover law enforcement with payment information for the Dibutylone purchase:

500g Dibutylone is \$700 USD, our [Money Transfer Company 1] information are below:

First name: Songyan
Last name: J[redacted]
Country: China

Pls tell me MTCN, 100% right and detailed address, recipient name and telephone number for shipping.

We changed our email cos new email looks more formal, our websit [sic] is
www.globalrc.net

Regards,

Gordon
www.globalrc.net
whatsapp +86 18117528156]]

102. The ZHENG Drug Trafficking Organization distributed the Dibutylone to the Ohio undercover law enforcement address on March 31, 2017, through Bin Wang's front companies.

103. On May 11, 2017, the ZHENG Drug Trafficking Organization attempted to distribute one kilogram of synthetic narcotics using Bin Wang's front companies in Woburn, Massachusetts, as a re-distribution point for drug traffickers in Florida and Pennsylvania. The parcel was shipped from Qinghua Y., who used his alias, Jason Yen: "JASON YEN, 509-2 Building C, Changzhou, Tianan City, China." The listed recipient for the parcel coming from China was the Organization's narcotics re-distribution point in the United States at that time: "Chemcloud, Inc., 5 Walnut Hill Park, Suite 13, Woburn, Massachusetts 01801." The product was mislabeled as a non-controlled chemical that acts as a fire retardant.

104. On May 11, 2017, the ZHENG Drug Trafficking Organization distributed one kilogram of FUB-AMB. It used Bin Wang's front companies in Woburn, Massachusetts, as a re-distribution point to send it to a drug customer in Lancaster, Pennsylvania. The parcel was listed as coming from Qinghua Y.'s alias, Jason Yen: JASON YEN, 509-2 Building C, Changzhou, Tianan City, China to Chemcloud, Inc., 5 Walnut Hill Park, Suite 13, Woburn, Massachusetts 01801.

105. On May 11, 2017, the ZHENG Drug Trafficking Organization distributed a drug parcel containing 4'-methyl-alpha-PHP, 4'-fluoro-alpha-PHP, FUB-AMB, all synthetic

narcotics. The drug parcels were addressed from Jason Yen, Qinghua Y.'s alias: "JASON YEN, 509-2 BLDG C, Changzhou Tianan CY, Changzhou, JS, 213164, China, CN" and addressed to "BIN WANG, CHEMCLOUD, INC., 5 Walnut Hill Park, Suite 13, Woburn, MA 01801, 617-935-2742." The supporting documentation the Organization provided falsely stated that the package contained a flame retardant compound. The drugs were labeled for reshipping to different individuals in different states.

106. On or about May 23, 2017, the ZHENG Drug Trafficking Organization co-conspirators operating in Missouri possessed with intent to distribute 145.4 kilograms of synthetic narcotics, as well as several firearms. The ZHENG Drug Trafficking Organization used Bin Wang's companies in Woburn, Massachusetts, to smuggle the kilograms of synthetic narcotics into Missouri.

107. On or about June 5, 2017, the ZHENG Drug Trafficking Organization distributed ADB-FUBINACA, a Schedule I controlled substance, to an undercover law enforcement address in Ohio through Bin Wang's front companies in Woburn, Massachusetts.

108. On June 9, 2017, the ZHENG Drug Trafficking Organization received an alert on its goldenchemical@live.com email account from its vendor page on TradeIndia.com for a buyer interested in purchasing bulk 3-CMC, an analogue of Schedule I controlled substance Mephedrone. The buyer was interested in buying "6-10 kg per month."

109. On June 10, 2017, a drug customer in Maryland confirmed that he sent payment for 4-MPD (a psychoactive cathinone) to the following Money Transfer Company 2 account:

[Money Transfer Company 2] Reference number is 75468889

Recipient: Guifeng C[redacted]

110. On June 12, 2017, a drug trafficker emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com, stating, "Looking for something that is legal and doesn't show up on drug screens in the US. Let me Know what you have that fits the criteria." The next day, the Organization replied using goldenchemical@live.com, "My friend, our website is www.globalrc.net Pls tell me which products you wanna buy. Now we have warehouse in USA, we can ship to you from warehouse in USA. Please send reply to our new email later, it's sales@globalrc.net."

111. On July 6, 2017, undercover law enforcement emailed sales@globalrc.net and purchased ADB-FUBINACA from the ZHENG Drug Trafficking Organization. When requesting payment information, the ZHENG Drug Trafficking Organization directed the undercover agent to wire money directly into GUANGHUA ZHENG's bank account, but to conceal the nature of the transaction:

Please do not label the money is for buying adb-fubinaca when you transfer money, don't label any chemical name, otherwise I worry the account will be cancelled. I suggest that you label it as tuition fee or Family maintenance when transfer money, our bank information is below:

Beneficiary Name: ZHENG GUANGHUA
Bank Name: China Merchants Bank Hong Kong Branch
Account number: [redacted]1756
Swift code: [redacted]KHH
Address: 21/F, Bank of America Tower, 12 Harcourt Road, Hong Kong

112. The same China Merchants Bank, Hong Kong Branch, account ending in 1756 to which "GORDON JIN" instructed the undercover agent to wire drug money had significant wire activity involving both FUJING ZHENG's and GUANGHUA ZHENG's Bank of China accounts located in China. Numerous clients and co-conspirators of the ZHENG Drug Trafficking Organization were also instructed to send funds into GUANGHUA ZHENG's China

Merchants Bank, Hong Kong Branch, account ending in 1756 for the purchase of synthetic narcotics.

113. On July 14, 2017, the ZHENG Drug Trafficking Organization distributed Schedule I controlled substances and analogues Dibutylone, 4-Methyl-PHP (MPHP), and ADB-FUBINACA. It shipped the synthetic narcotics in bulk freight to Bin Wang's front companies in Woburn, Massachusetts, as a re-distribution point to send to drug customers in Alabama, Florida, and Ohio, respectively. The parcel was listed as coming from Jason Yen, Qinghua Y.'s alias: "JASON YEN, CHEMCLOUD, INC., Room 920, Changwu Road 888, Jiangsu, Changzhou 213164, China" and was addressed to Bin Wang at 5 Walnut Hill Park, Suite 13, Woburn, Massachusetts 01801. The products were mislabeled as a non-controlled chemical compound. The drugs were stored in heat-sealed foil bags addressed to individuals residing in separate states. In addition, the parcel contained printed waybills that falsely stated, "This is to certify that [. . .] this chemical is not listed in Controlled Chemical Act in US. Yours sincerely, Sales Manager JASON YEN." JASON YEN also signed a Toxic Substance Control Act (TSCA) form dated July 12, 2017, certifying that "all chemicals in this shipment are not subject to TSCA." The package of ADB-FUBINACA was an undercover purchase destined for Ohio.

114. On July 14, 2017, Bin Wang learned that he was the target of a federal drug trafficking investigation while returning from China. On July 17, 2017, Wang distributed numerous ZHENG Drug Trafficking Organization parcels that had been stored at a warehouse at 5 Walnut Hill Park, Woburn, Massachusetts. On July 21, 2017, Wang attempted to leave the country and was arrested by law enforcement.

115. On August 2, 2017, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at sales@globalrc.net to inquire as to the status of a drug package that

Bin Wang and his companies were originally going to re-ship but that law enforcement had seized. As an explanation for the non-delivery of the drug shipment from Bin Wang's companies, the Organization indicated that the "shipping company is still solving problems of FedEx." The Organization instead sent undercover law enforcement a "replacement package" of ADB-FUBINACA via a freight forwarder located in the Republic of Tonga. On August 24, 2017, after a U.S. federal judge ordered Wang's pretrial detention, the Organization informed undercover law enforcement, "sorry, we can not ship by FedEx now, we ship by special way from Tonga, just same as last time, is this OK with you?"

116. On September 19, 2017, FUJING ZHENG emailed the subject Asian Cryptocurrency Exchange from his personal email account, zhengfujing@[redacted].cn:

I have an account on [Asian Cryptocurrency Exchange]. my login name is zhengfujing@[redacted].cn ,

I'm a China resident, Can I withdraw USD to my bank account in Hongkong?

Regards,

GORDON

117. The ZHENG Drug Trafficking Organization used the subject Asian Cryptocurrency Exchange account to obtain and launder drug proceeds. FUJING ZHENG received periodic emails from the Asian Cryptocurrency Exchange to his personal email account, zhengfujing@[redacted].cn, updating him concerning withdrawals and payments made into the account.

118. On November 10, 2017, the ZHENG Drug Trafficking Organization updated its vendor page on the trade website www.chinaqualitylighting.com to list over 30 controlled substances for sale. On the product page for U-47700, the Organization noted that "investigated toxicity levels of U-47700 for sale are extremely high." The People's Republic of China banned

the manufacture and distribution of U-47700 on June 19, 2017, several months before the Organization updated its list of synthetic narcotics for sale to include U-47700. On the page, the Organization also claimed that it and the trade website had a valid internet content license “by the Chinese Ministry” to operate the web page.

119. On or about December 1, 2017, the ZHENG Drug Trafficking Organization updated its website www.globalrc.net. On the site, the Organization described itself as a large-scale synthetic drug manufacturer, stating that it “produces and sells more than 16 tonnes of chemicals every month” from “our own laboratory.” The only chemicals listed on the website were synthetic narcotics. According to the Organization, its laboratory was able to “synthesize nearly any chemical on a bespoke basis in any quantity.” The Organization also explained that it had small and large-scale drug distributors (“retailers and wholesalers”) operating around the world (emphasis added):

Located in China, we are a leading pharmaceutical company, honored as the high-tech enterprise which engaged in researching, manufacturing and exporting research chemicals, sedatives, active pharmaceutical ingredients (API) and other fine chemicals. **We have our own laboratory so that we can research, synthesize and produce all our own production and perform quality control procedures. We produce and sell more than 16 tonnes of chemicals every month. Besides, we also can synthesize nearly any chemical on a bespoke basis in any quantity,** what we need are chemical name, CAS number, IUPAC name or chart of chemical structure. **We have developed many retailers and wholesalers in US and Europe during these years, their sales amount is constantly growing every month.** Almost all our customers are loyal to cooperate us because they know that they have wide range of best products, flexible payment options, fast and insured delivery, secured and comfortable ordering process, prompt and effective customer service.

120. In addition, the Organization explained that it has advanced smuggling methods that complement its abilities as a large-scale synthetics manufacturer. These methods include “warehouses” (reshipping locations) in multiple locations that make drug shipments in destination countries appear to be purely domestic mailings:

The best way to save time and money is to deal with a reliable company. Globalrc.net guarantees 100% deliver and reshipment of products if package got seized by customs. We ship the chemicals by EMS, USPS, TNT, DHL, Fedex, UPS and special ways to USA, Russia, Europe and other countries, there are Warehouse available in USA and Europe, the delivery is to your door.

121. The Organization also explained that it uses techniques to reduce the probability that law enforcement would find narcotics in its packaging, stating, "We understand that our customers require privacy, so special care is taken when packaging products." It also offered special deals and expedited shipping for bulk narcotics purchases of 25 kilograms or more.

122. On December 4, 2017, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at Sales@globalrc.net regarding opioids it had for sale, "I've heard good things about methoxyacetyl-fentanyl. What are your prices? Also do you have any reviews for BUC-188?" GORDON JIN sent the following response:

My friend, I suggest that you pay by [Money Transfer Company 2], Bitcoin or OKPAY (www.okpay.com) when you buy sample. We can accept [Money Transfer Company 2], Bitcoin, Bank wire transfer or OKPAY (www.okpay.com) when formal order. Prices of 1kg are below:

methoxyacetyl-fentanyl-----\$5,500 USD

BUC-188-----\$5,200 USD

Pls be noted that the price we offer including shipping cost.

we have a lot of experience in shipping, packages we sent can go through customs safely, we guarantee that package can pass customs, we will reship free in case of package get seized by customs. What we offer is not only product, but also service behind the product. It's very important for customer, if you don't receive anything after you pay, it will make no sense

Currently, payments we accept are Bitcoin, OKPAY (www.okpay.com), [Money Transfer Company 2] and bank wire transfer. Pls tell me how many quantity of each you wanna buy? Do you wanna have a sample order to try?

Kind Regards,

GORDON JIN
www.globalrc.net
WhatsApp: +86 18117528156

123. On January 10, 2018, GUANGHUA ZHENG sent an email relating to an investment opportunity from his personal email account, zhengguanhua1955@[redacted].com, with an attachment. The attachment contained information relating to FUJING ZHENG, including that FUJING ZHENG owned a home worth more than 1.2 million U.S. dollars in China.

124. On January 14, 2018, the ZHENG Drug Trafficking Organization listed over a dozen synthetic narcotics for sale on ruglobalrc.net, a Russian language mirror of the Organization's primary website, www.globalrc.net.

125. On February 7, 2018, a foreign entity emailed FUJING ZHENG and GUANGHUA ZHENG at their respective personal email accounts, asking for more information about their finances. Earlier in the conversation, FUJING ZHENG and GUANGHUA ZHENG indicated to the foreign entity that they plan to move "3 million" and "2 million" in deposits, respectively, into the foreign entity's account.

126. On February 22, 2018, FUJING ZHENG spoke with an undercover law enforcement officer over the telephone regarding smuggling bulk shipments of narcotics into the United States. The conversation was in Mandarin, with undercover law enforcement dialing the number for "GORDON JIN" listed on www.gobalrc.net. On the call, the undercover officer discussed ordering approximately 15 kilograms or more of potent synthetic opioid U-48800 and other dangerous controlled substance analogues a month and having the Organization smuggle them into the United States. FUJING ZHENG described himself as "GORDON" and the "manager for foreign trading" and explained that he handled all interactions with customers. FUJING ZHENG also noted that the Organization operated out of Taizhou, Jiangsu in China, which is near Shanghai. When undercover law enforcement mentioned that they would initially

order 10 kilograms of U-48800 that the Organization would need to smuggle into Florida, FUJING ZHENG responded that 10 kilograms of U-48800 per order is not a problem and that “we have a route to Florida.” FUJING ZHENG also guaranteed that his chemical’s purity “is 99.5% and up.”

127. On March 11, 2018, after undercover law enforcement asked about payment methods for a proposed purchase of 4-CL-PVP, the ZHENG Drug Trafficking Organization replied, “Yes, we have it in stock. Can you pay by Bitcoin or Litecoin? Bitcoin and Litecoin belong to encrypt currency, they are anonymous, safe, fast and convenient. I recommend some website below to you, they need to register at first, then just can transfer by Litecoin or Bitcoin.”

128. From on or about March 12, 2018 to on or about March 19, 2018, the ZHENG Drug Trafficking Organization attempted to distribute over 50 packages containing kilogram quantities of synthetic narcotics across the United States. These packages, which were destined for individual customers across 23 states, were seized by law enforcement.

129. On March 16, 2018, after the parties agreed that undercover law enforcement would pay for the 4-CL-PVP in Bitcoin, the ZHENG Drug Trafficking Organization sent the following email containing the Bitcoin public key needed to finalize the transaction:

Our Bitcoin address is [redacted]PA1xX8A

Pls also tell me 100% right and detailed address, recipient name and telephone number for shipping.

Our WhatsApp number changed, new number is +852 62326317

Kind Regards,

GORDON JIN
www.globalrc.net
WhatsApp: +852 62326317

130. On March 23, 2018, undercover law enforcement transferred bitcoins to the ZHENG Drug Trafficking Organization's Bitcoin wallet as payment for the 4-CL-PVP. On April 12, 2018, the ZHENG Drug Trafficking Organization distributed 500 grams of 4-CL-PVP to an undercover law enforcement address in the Northern District of Ohio.

131. The Bitcoin public key address [redacted]PA1xX8A related back to an account with a European Cryptocurrency Exchange. GUANGHUA ZHENG opened this account on October 5, 2017, listing his contact email address as ZHENG GUANGHUA1955@[redacted].com. GUANGHUA ZHENG's birth year is 1955. As part of the European Cryptocurrency Exchange account creation process, GUANGHUA ZHENG provided a photograph of himself along with his valid People's Republic of China passport. Within a short time in 2017, GUANGHUA ZHENG transferred \$184,844.32 from his China Merchants Bank x1756 account into his European Cryptocurrency Exchange account. The x1756 account and the European Cryptocurrency Exchange account were two of the bank accounts and cryptocurrency exchange accounts that GUANGHUA ZHENG used to launder drug proceeds for the ZHENG Drug Trafficking Organization.

132. On March 9, 2018, GUANGHUA ZHENG responded to the European Cryptocurrency Exchange's request for information responsive to its Know Your Customer requirements. GUANGHUA ZHENG alleged that he only made \$50,000 (U.S.) a year in salary. Despite allegedly earning only \$50,000 a year in income, GUANGHUA ZHENG informed the Exchange that he had over \$1,000,000 in savings, planned to deposit approximately \$1,000,000 per year into his European Cryptocurrency Exchange account going forward, and withdraw approximately \$700,000 per year from the Exchange account. GUANGHUA ZHENG's stated purpose for the monetary transfers was "investing."

133. In his response to the European Cryptocurrency Exchange, GUANGHUA ZHENG also provided his personal bank account information:

Beneficiary Name: ZHENG GUANGHUA
Bank Name: China Merchants Bank Hong Kong Branch
Account number: [redacted]1756
Swift Code: [redacted]KHH
Address: 21/F, Bank of America Tower, 12 Harcourt Road, Central, Hong Kong

134. As previously alleged, the ZHENG Drug Trafficking Organization had instructed drug traffickers and undercover law enforcement to wire drug payments to GUANGHUA ZHENG's x1756 account at China Merchants Bank.

135. When the European Cryptocurrency Exchange had further questions based on his responses and requested additional documentation, GUANGHUA ZHENG threatened to terminate his business with the exchange, stating, "[i]f you don't accept all documents I can offer, then I will not invest Cryptocurrency on [the European Cryptocurrency Exchange], just return my money."

136. On April 16, 2018, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at sales@globalrc.net about the Organization creating counterfeit Oxycodone pills that instead contained U-48800, a potent opioid. The email contained pictures of the pills and asked if the Organization can "make a custom order and press the U-48800 to look like these tablets?" The Organization responded, "If we press so for you, how many tablets will [you] buy from us?"

137. On April 18, 2018, FUJING ZHENG sent an email from his personal email account, zhengfujing@[redacted].cn, to info@TopLabRC.com, an email account associated with the ZHENG Drug Trafficking Organization's latest drug trafficking website,

www.TopLabRC.com. In reference to the new website, FUJING ZHENG emailed, "this is very good."

138. On April 19, 2018, law enforcement requested a quote from FUJING ZHENG at sales@globalrc.net for two kilograms of Dibutylone. The ZHENG Drug Trafficking Organization provided a quote shortly thereafter. Law enforcement then indicated it would pay in Bitcoin, asking for a Bitcoin address. On May 3, 2018, undercover law enforcement received the following reply from the Organization using sales@globalrc.net:

Our Bitcoin address is [redacted]F4uhiy

Pls inform me after you transfer money. Pls also tell me 100% right and detailed address, recipient name and telephone number for shipping.

Kind Regards,

GORDON JIN
www.globalrc.net
WhatsApp: +852 62326317

139. The Bitcoin address [redacted]F4uhiy associates to the subject Asian Cryptocurrency Exchange account in the (full) name of GUANGHUA ZHENG that uses the email address ZHENGFUJING@[redacted].cn as a point of contact.

140. ZHENGFUJING@[redacted].cn is the personal email account of FUJING ZHENG.

141. On May 17, 2018, undercover law enforcement transferred Bitcoins (approximately \$2,800.00 USD) to the subject Asian Cryptocurrency Exchange account - particularly, the ZHENG Drug Trafficking Organization's [redacted]F4uhiy Bitcoin wallet - as payment for the two kilogram shipment of Dibutylone. Further, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at its email account [sales@globalrc.net] as follows:

We just sent \$2,800.00 usd in Bitcoin to your designated wallet: [redacted]F4uhiy

you should get it within the next 30 minutes. This is payment for 2 kilograms of Dibutylone, to be shipped to Ohio, USA, as per our earlier communications.

Please let us know when you receive our payment, and I will send you the delivery address / information.

142. On May 18, 2018, the ZHENG Drug Trafficking Organization used its email account sales@globalrc.net to respond to undercover law enforcement in the Northern District of Ohio with the following:

We received the money, pls tell me detailed address, recipient name and telephone number for shipping.

Kind Regards,

Gordon
www.globalrc.net
WhatsApp: +852 62326317

143. On June 7 and 14, 2018, the ZHENG Drug Trafficking Organization distributed the two kilograms of Dibutylone into the Northern District of Ohio as part of the undercover purchase.

144. On April 20, 2018, undercover law enforcement had emailed the ZHENG Drug Trafficking Organization at sales@globalrc.net, asking if the Organization could create Adderall pills that include the “bath salt” Dibutylone. The Organization replied, “we can do so, please tell me how many pills or tablets of each you want?” On April 22, 2018, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at sales@globalrc.net, “how many tablets [of counterfeit Adderall] can you make with a kilogram of Dibutylone? What would the cost run us?” The Organization responded, “We made pills for USA customers before. You need to tell me formula at first, then I just can tell you that how many tablets we can make with a kilogram of Dibutylone.”

145. On April 24, 2018, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at sales@globalrc.net, providing pictures of trademarked Adderall 20mg tablets and stating, “We’d like you to make these up to look like Adderall 20’s.” Undercover law enforcement then provided the chemical formula and asked for the Organization to “replace the active ingredients with the Dibutylone.” In subsequent emails, undercover law enforcement emphasized, “Again, these should look like exact copies of the tablet I sent to you” and “these should look like Adderall IR (immediate release) 20mg tablets, like in the photo.” On April 28, 2018, after confirming the final chemical formula for the counterfeit pills, the Organization stated that it could prepare “50,000 pills” of Adderall laced with Dibutylone.

146. On or about May 18, 2018, the ZHENG Drug Trafficking Organization advertised its ability to operate as a large-scale drug laboratory on the “Custom Synthesis” page of its website, www.globalrc.net. This advertisement was one of many the Organization made over several years touting its process of creating and manufacturing synthetic narcotics:

Globalrc.net has more than 7 years experience in providing custom synthesis in our laboratory. We work diligently to make every possible chemical to meet the needs of our customers. What this means is that you can purchase many other products than the ones you found on our website. We will create custom-made products for you. The new product will satisfy your requirements.

[...]

Our laboratory is equipped with latest technological innovations and all the necessary instruments and process vessels. We also have a large variety of chemicals. This allows synthesizing of all kinds of chemical compounds even when no data about previous synthesis method or IP basis is available. We work out our own methodology and make the initial research. Our customers are not involved in this process as it can be very complex but will receive the final product with their required parameters.

147. On June 19, 2018, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at its email account [sales@globalrc.net] as follows:

Yes. \$8,000.00 usd for 50,000 fake 20mg Adderall tablets (exact copies), made with Dibutylone instead of amphetamines.

What's the Bitcoin wallet address you want us to send the \$8,000.00 to?

148. On June 20, 2018, the ZHENG Drug Trafficking Organization used its email account [sales@globalrc.net] to respond to undercover law enforcement in the Northern District of Ohio with the following:

Our Bitcoin wallet address is [redacted]F4uhiy

Pls inform me after you transfer money.

Our WhatsApp number changed, new number is +8615221075636

Kind Regards,

Gordon
www.globalrc.net
WhatsApp: +8615221075636

149. The Bitcoin address [redacted]F4uhiy associates to the subject Asian Cryptocurrency Exchange account in the (full) name of GUANGHUA ZHENG that uses the email address ZHENGFUJING@[redacted].cn as a point of contact.

150. On June 26, 2018, the ZHENG Drug Trafficking Organization used its email account [sales@globalrc.net] to email undercover law enforcement in the Northern District of Ohio as follows:

6 days passed, when will you order 50000 pills of dibutylone pills?

Our WhatsApp number changed, new number is +8615221075636

Kind Regards,

Gordon
www.globalrc.net
WhatsApp: +8615221075636

151. On June 28, 2018, undercover law enforcement responded to the ZHENG Drug Trafficking Organization at its email account sales@globalrc.net:

We are sending the funds tonight. My client wanted assurances that the product will be an exact visual match for Adderall 20mg. Provided they are satisfied with the product, we expect to have substantially more orders for tablets in the near future.

I will be in touch later on with confirmation of transfer and our new address.

152. On June 28, 2018, undercover law enforcement transferred Bitcoins (approximately \$8,000.00 USD) to the subject Asian Cryptocurrency Exchange account - particularly, the ZHENG Drug Trafficking Organization's [redacted]F4uhy Bitcoin wallet - as payment for the 50,000 Adderall tablets made with one kilogram of Dibutylone. Further, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at its email account [sales@globalrc.net] as follows:

We just sent the \$8,000.00 usd to your designated Bitcoin wallet for the 50,000 Adderall fake tablets, to be made with Dibutylone. Please conform [sic] receipt of the funds when you receive them. Should take about 45 minutes.

153. On June 29, 2018, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at its email account [sales@globalrc.net] as follows:

Did you receive the funds we sent?

154. On June 29, 2018, the ZHENG Drug Trafficking Organization used its email account sales@globalrc.net to respond to undercover law enforcement in the Northern District of Ohio with the following:

We received the money, we will begin to produce a.s.a.p. Our WhatsApp number changed, new number is +8615221075636

Kind Regards,

Gordon
www.globalrc.net
WhatsApp: +8615221075636

155. On or about July 15, 2018, the ZHENG Drug Trafficking Organization maintained its vendor page on www.tradekey.com. There, it stated that it had manufactured “research chemical” and “pharmaceutical chemical” since 2007. It stated that its “main market” was “worldwide.” The Organization also stated that its “total annual sales volume” was “more than 100 million USD” and that it employed more than 50 employees.

156. On or about July 30, 2018, the ZHENG Drug Trafficking Organization maintained mirror websites of www.globalrc.net in over 35 languages, ranging from Japanese to Creole.

157. On August 6, 2018, Bin Wang entered guilty pleas to the following charges in N.D. Ohio Case No. 1:18-CR-123: Drug Conspiracy, in violation of 21 U.S.C. § 846; Conspiracy to Import a Controlled Substance, in violation of 21 U.S.C. § 963; Drug Distribution (four counts), in violation of 21 U.S.C. § 841; Attempted Drug Distribution, in violation of 21 U.S.C. §§ 841 and 846; and, Drug Abuse Prevention and Control Use of a Communication Facility (three counts), in violation of 21 U.S.C. § 843(b). Sentencing in N.D. Ohio Case No. 1:18-CR-123 is scheduled for November 13, 2018.

158. On August 10, 2018, the ZHENG Drug Trafficking Organization emailed undercover law enforcement using its email account, sales@globalrc.net. The Organization informed undercover law enforcement that it had created the counterfeit Adderall adulterated with Dibutylone.

159. Throughout the conspiracy, the ZHENG Drug Trafficking Organization utilized Money Transfer Companies 1 and 2 to receive funds from drug trafficking. Within the last few years, FUJING ZHENG and GUANGHUA ZHENG alone received over \$1 million through money service business transfers directly to them through these companies. This amount does

not include other accounts at Money Transfer Companies 1 and 2, other financial and digital currency services, and other co-conspirators used to obtain the drug proceeds.

160. On August 15, 2018, U.S. District Judge John R. Adams issued a seizure warrant for “All contents of crypto-currency account described as follows: [Asian Cryptocurrency Exchange] account in the (full) name of GUANGHUA ZHENG; Username: zhengfujing@[redacted].cn”. The Bitcoin address of [redacted]F4uhiy is associated with this account. On or about August 21, 2018, Special Agents of the Drug Enforcement Administration and Internal Revenue Service, Criminal Investigation, seized the defendant funds in the amount of \$23,110.82 from the account. As alleged above, the defendant property is now in the custody of the United States Marshals Service.

161. On August 17, 2018, a 43-count Indictment was returned against defendants FUJING ZHENG and GUANGHUA ZHENG in N.D. Ohio Case No. 1:18-CR-474. *Inter alia*, the defendants were charged with the following:

- a.) Conspiracy to Manufacture, Distribute, and Possess with the Intent to Distribute Controlled Substances and Controlled Substance Analogues Resulting in Death [21 U.S.C. Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C)], all in violation of 21 U.S.C. § 846.
- b.) Conspiracy to Import Controlled Substances and Controlled Substance Analogues into the United States Resulting in Death [21 U.S.C. Sections 952(a), 960(a)(1), 960(b)(1), and 960(b)(3)], all in violation of 21 U.S.C. § 963.
- c.) Conspiracy to Manufacture and Distribute Controlled Substances and Controlled Substance Analogues for Purpose of Unlawful Importation and Resulting in Death [21 U.S.C. Sections 959(a), 960(a)(3), 960(b)(1), and 960(b)(3)], all in violation of 21 U.S.C. § 963.
- d.) Manufacture and Distribution of Dibutylone for Purpose of Unlawful Importation, in violation of 21 U.S.C. Sections 959, 960(a)(3), and 960(b)(3) – and 18 U.S.C. Section 2.
- e.) Distributing Controlled Substances by Means of the Internet, in violation of 21 U.S.C. Sections 841(h), 841(b)(1)(A), and 841(b)(1)(C).

- f.) Advertising Controlled Substances Sales by Means of the Internet, in violation of 21 U.S.C. § 843(c)(2)(A).
- g.) Money Laundering Conspiracy, in violation of 18 U.S.C. § 1956(h).
- h.) International Promotional Money Laundering, in violation of 18 U.S.C. Sections 1956(a)(2)(A) and 2.

162. From in or about August 2017 – shortly after law enforcement stopped Bin Wang’s operation – to the filing of the August 17, 2018, Indictment in N.D. Ohio Case No. 1:18-CR-474, the ZHENG Drug Trafficking Organization attempted to use other companies such as “Shipping Company 1” to illegally import narcotics into the United States and re-ship them throughout the country while avoiding detection. In early 2018 alone, Shipping Company 1 was the return addressee and responsible for the postage on over 200 packages containing controlled substances and/or controlled substance analogues.

CONCLUSION

163. By reason of the foregoing, the defendant property [namely, funds in the amount of \$23,110.82] is subject to forfeiture to the United States under 21 U.S.C. § 881(a)(6) in that it constitutes proceeds from illegal drug trafficking activities, and/or was used or was intended to be used in exchange for illegal controlled substances/illegal controlled substance analogues, and/or was used or was intended to be used to facilitate illegal drug trafficking activities.

164. By reason of the foregoing, the defendant property also is subject to forfeiture to the United States under 18 U.S.C. § 981(a)(1)(A) in that it constitutes property involved in a transaction, or attempted transaction, in violation of 18 U.S.C. Section 1956 (money laundering), or is property traceable to such property.

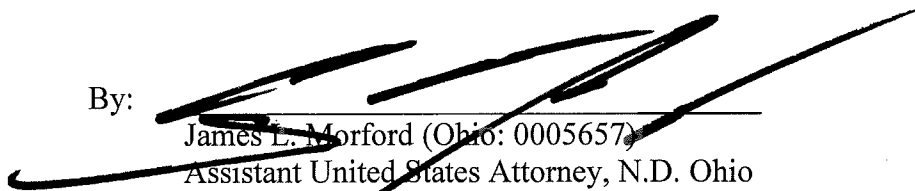
WHEREFORE, plaintiff, the United States of America, requests that this Court enter judgment condemning the defendant property and forfeiting it to the United States, and providing

that the defendant property be delivered into the custody of the United States for disposition according to law, and for such other relief as this Court may deem proper.

Respectfully submitted,

Justin E. Herdman
U.S. Attorney, Northern District of Ohio

By:

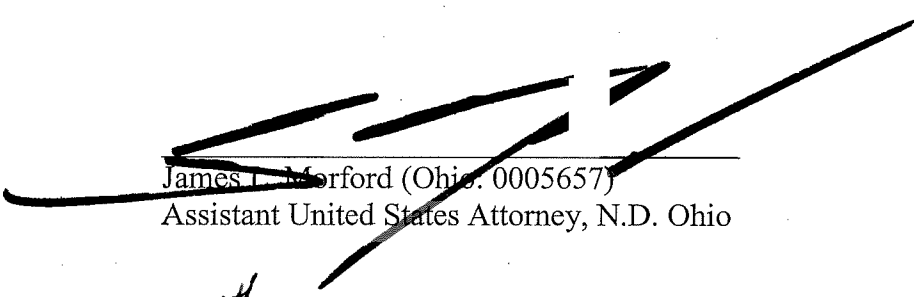


James L. Morford (Ohio: 0005657)
Assistant United States Attorney, N.D. Ohio
Carl B. Stokes U.S. Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113
216.622.3743 / Fax: 216.522.7499
James.Morford@usdoj.gov

VERIFICATION

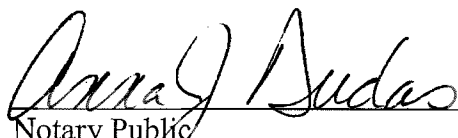
STATE OF OHIO)
) SS.
COUNTY OF CUYAHOGA)

I, James L. Morford, under penalty of perjury, depose and say that I am an Assistant United States Attorney for the Northern District of Ohio, and the attorney for the plaintiff in the within entitled action. The foregoing Complaint in Forfeiture is based upon information officially provided to me and, to my knowledge and belief, is true and correct.



James L. Morford (Ohio: 0005657)
Assistant United States Attorney, N.D. Ohio

Sworn to and subscribed in my presence this 13th day of September, 2018.



Notary Public Anna J. Dudas
Notary Public, State of Ohio
My Commission Expires 12/5/2021 *ad*

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

James L. Morford, Assistant U.S. Attorney - 400 U.S. Court House,
801 West Superior Avenue, Cleveland, Ohio 44113 - 216.622.3743

DEFENDANTS

Funds in the amount of \$23,110.82 seized from an Asian
Cryptocurrency Exchange account in the name of Guanghua Zheng

County of Residence of First Listed Defendant Cuyahoga County
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☐ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

civil forfeiture action under 21 U.S.C. Sec. 881(a)(6) (drugs) and 18 U.S.C. Sec. 981(a)(1)(A) (money laundering)

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE John R. Adams

DOCKET NUMBER N.D. Ohio 1:18-CR-474

DATE
09/14/2018

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING FEE

JUDGE

MAG. JUDGE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

I. Civil Categories: (Please check one category only).

1. ☒ General Civil
2. ☐ Administrative Review/Social Security
3. ☐ Habeas Corpus Death Penalty

*If under Title 28, §2255, name the SENTENCING JUDGE: _____

CASE NUMBER: _____

II. **RELATED OR REFILED CASES.** See LR 3.1 which provides in pertinent part: "If an action is filed or removed to this Court and assigned to a District Judge after which it is discontinued, dismissed or remanded to a State court, and subsequently refiled, it shall be assigned to the same Judge who received the initial case assignment without regard for the place of holding court in which the case was refiled. Counsel or a party without counsel shall be responsible for bringing such cases to the attention of the Court by responding to the questions included on the Civil Cover Sheet."

This action is ☒ **RELATED** to another **PENDING** civil case. This action is ☐ **REFILED** pursuant to **LR 3.1**.

If applicable, please indicate on page 1 in section VIII, the name of the Judge and case number.

III. In accordance with Local Civil Rule 3.8, actions involving counties in the Eastern Division shall be filed at any of the divisional offices therein. Actions involving counties in the Western Division shall be filed at the Toledo office. For the purpose of determining the proper division, and for statistical reasons, the following information is requested.

ANSWER ONE PARAGRAPH ONLY. ANSWER PARAGRAPHS 1 THRU 3 IN ORDER. UPON FINDING WHICH PARAGRAPH APPLIES TO YOUR CASE, ANSWER IT AND STOP.

(1) **Resident defendant.** If the defendant resides in a county within this district, please set forth the name of such county

COUNTY: Cuyahoga

Corporation For the purpose of answering the above, a corporation is deemed to be a resident of that county in which it has its principal place of business in that district.

(2) **Non-Resident defendant.** If no defendant is a resident of a county in this district, please set forth the county wherein the cause of action arose or the event complained of occurred.

COUNTY:

(3) **Other Cases.** If no defendant is a resident of this district, or if the defendant is a corporation not having a principle place of business within the district, and the cause of action arose or the event complained of occurred outside this district, please set forth the county of the plaintiff's residence.

COUNTY:

IV. The Counties in the Northern District of Ohio are divided into divisions as shown below. After the county is determined in Section III, please check the appropriate division.

EASTERN DIVISION

☐
☒
☐

AKRON
CLEVELAND
YOUNGSTOWN

(Counties: Carroll, Holmes, Portage, Stark, Summit, Tuscarawas and Wayne)
(Counties: Ashland, Ashtabula, Crawford, Cuyahoga, Geauga, Lake,
Lorain, Medina and Richland)
(Counties: Columbiana, Mahoning and Trumbull)

WESTERN DIVISION

☐

TOLEDO

(Counties: Allen, Auglaize, Defiance, Erie, Fulton, Hancock, Hardin, Henry,
Huron, Lucas, Marion, Mercer, Ottawa, Paulding, Putnam, Sandusky, Seneca
VanWert, Williams, Wood and Wyandot)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

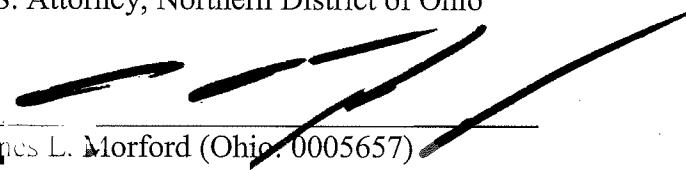
UNITED STATES OF AMERICA,) CASE NO.
)
Plaintiff,) JUDGE
)
v.)
)
FUNDS IN THE AMOUNT OF \$23,110.82)
SEIZED PURSUANT TO THE EXECUTION OF)
A FEDERAL SEIZURE WARRANT FROM A)
CRYPTOCURRENCY ACCOUNT IN THE)
(FULL) NAME OF GUANGHUA ZHENG;)
USERNAME: zhengfujing@[redacted].cn,)
)
Defendant.) PRAECIPE

The United States of America respectfully requests that the Clerk of this Court issue the attached Warrant of Arrest *in Rem* to the United States Marshals Service (USMS) pursuant to Rule G(3)(b)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.

Respectfully submitted,

Justin E. Herdman
U.S. Attorney, Northern District of Ohio

By:


James L. Morford (Ohio: 0005657)
Assistant United States Attorney, N.D. Ohio
Carl B. Stokes U.S. Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113
216.622.3743 / Fax: 216.522.7499
James.Morford@usdoj.gov

United States District Court

NORTHERN DISTRICT OF OHIO

WARRANT OF ARREST *IN REM*

TO: THE UNITED STATES MARSHAL AND/OR ANY OTHER DULY AUTHORIZED LAW ENFORCEMENT OFFICER:

WHEREAS, on September 14, 2018 a Complaint in Forfeiture was filed in this Court by Justin E. Herdman, United States Attorney for this District, on behalf of the United States, against:

Funds in the amount of \$23,110.82 seized from a cryptocurrency account described as follows: [Asian Cryptocurrency Exchange] account in the (full) name of GUANGHUA ZHENG; Username: zhengfujing@[redacted].cn, Address: Room xxx, No. xx, Huochezhan Rd., Lane 118, Jiading, Shanghai, China 201802, Nationality: China. The cryptocurrency deposit address associated with this user is as follows: BITCOIN: [redacted]F4uhy.

and WHEREAS, the defendant funds are currently in the possession, custody, or control of the United States; and,

WHEREAS, Rule G(3)(b)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions directs the Clerk of the Court to issue a Warrant of Arrest *In Rem* for the arrest of the defendant funds; and,

WHEREAS, Rule G(3)(c) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions provides that the Warrant of Arrest *In Rem* must be delivered to a person or organization authorized to execute it;

YOU ARE COMMANDED to arrest the defendant funds by serving a copy of this warrant on the custodian in whose possession, custody, or control the funds are presently found, and to use whatever means may be appropriate to protect and maintain them in your custody until further order of this Court.

YOU ARE FURTHER COMMANDED to file the same in this Court with your return thereon.

WITNESS THE HONORABLE		UNITED STATES DISTRICT JUDGE AT	
DATE September 14, 2018	CLERK (BY) DEPUTY CLERK		
Returnable <u>-60-</u> days after issue.			
UNITED STATES MARSHALS SERVICE			
DISTRICT	DATE RECEIVED		DATE EXECUTED
U.S. MARSHAL			

USM-285 is a 5-part form. Fill out the form and print 5 copies. Sign as needed and route as specified below.

U.S. Department of Justice
United States Marshals Service**PROCESS RECEIPT AND RETURN**

See "Instructions for Service of Process by U.S. Marshal"

PLAINTIFF United States of America	COURT CASE NUMBER
DEFENDANT Funds: the amount of \$23,110.82 seized from an Asian Cryptocurrency Exchange account	TYPE OF PROCESS Warrant of Arrest in Rem
SERVE AT { NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN Funds: the amount of \$23,110.82 seized from an Asian Cryptocurrency Exchange account ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)	

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW

James L. Morford, Assistant U.S. Attorney
Office of the United States Attorney, Northern District of Ohio
Carl B. Stokes U.S. Court House, 801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113 - office: 216.622.3743

Number of process to be served with this Form 285

1

Number of parties to be served in this case

1

Check for service on U.S.A.

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available for Service):

Fold

Fold

Funds in the amount of \$23,110.82 seized from a cryptocurrency account described as follows: [Asian Cryptocurrency Exchange] account in the (full) name of GUANGHUA ZHENG; Username: zhengfujing@[redacted].cn, Address: Room xxx, No. xx, Huochezhan Rd., Lane 118, Jiading, Shanghai, China 201802, Nationality: China. The cryptocurrency deposit address associated with this user is as follows: BITCOIN: [redacted]F4uhiy.

Signature of Attorney other Originator requesting service on behalf of:

☒ PLAINTIFF
☐ DEFENDANT

TELEPHONE NUMBER

216.622.3743

DATE

9/14/18

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY-- DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated. (Sign only for USM 285 if more than one USM 285 is submitted)	Total Process _____	District of Origin No. _____	District to Serve No. _____	Signature of Authorized USMS Deputy or Clerk _____	Date _____
---	------------------------	---------------------------------	--------------------------------	---	---------------

I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above on the on the individual, company, corporation, etc. shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc. named above (See remarks below)

Name and title of individual served (if not shown above)

☐ A person of suitable age and discretion then residing in defendant's usual place of abode

Address (complete only different than shown above)

Date _____ Time _____
☐ am
☐ pm

Signature of U.S. Marshal or Deputy

Service Fee	Total Mileage Charges including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal* or (Amount of Refund*)
					\$0.00

REMARKS:

PRINT 5 COPIES:

1. CLERK OF THE COURT
2. USMS RECORD
3. NOTICE OF SERVICE
4. BILLING STATEMENT*: To be returned to the U.S. Marshal with payment, if any amount is owed. Please remit promptly payable to U.S. Marshal.
5. ACKNOWLEDGMENT OF RECEIPT

PRIOR EDITIONS MAY BE USED

Form USM-285
Rev. 12/15/80
Automated 01/00

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.
)
Plaintiff,) JUDGE
)
v.)
)
FUNDS IN THE AMOUNT OF \$23,110.82)
SEIZED PURSUANT TO THE EXECUTION OF)
A FEDERAL SEIZURE WARRANT FROM A)
CRYPTOCURRENCY ACCOUNT IN THE)
(FULL) NAME OF GUANGHUA ZHENG;)
USERNAME: zhengfujing@[redacted].cn,)
)
Defendant.) NOTICE OF FORFEITURE

To: Fujing Zheng

The above-captioned forfeiture action was filed in U.S. District Court on September 14, 2018. A copy of the Complaint in Forfeiture is attached. If you claim an interest in the defendant \$23,110.82, the following applies.

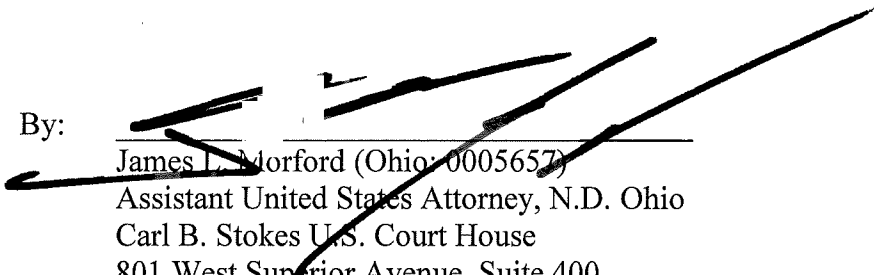
Pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, you are required to file with the Court, and serve upon plaintiff's attorney, whose address is United States Attorney's Office, 400 United States Court House, 801 West Superior Avenue, Cleveland, Ohio 44113, a verified claim to the defendant \$23,110.82 within 35 days after your receipt of the complaint. The claim shall contain the information required by Rule G(5) of the said Supplemental Rules. Additionally, you must file and serve an

answer to the complaint, or a motion under Rule 12 of the Federal Rules of Civil Procedure, within 20 days after the filing of the claim, exclusive of the date of filing. If you fail to do so, judgment will be taken for the relief demanded in the complaint.

Respectfully,

Justin E. Herdman
U.S. Attorney, Northern District of Ohio

By:


James L. Morford (Ohio: 0005657)
Assistant United States Attorney, N.D. Ohio
Carl B. Stokes U.S. Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113
216.622.3743 / Fax: 216.522.7499
James.Morford@usdoj.gov

Attorney for Plaintiff, United States of America

Date: September 14, 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.
)
Plaintiff,) JUDGE
)
v.)
)
FUNDS IN THE AMOUNT OF \$23,110.82)
SEIZED PURSUANT TO THE EXECUTION OF)
A FEDERAL SEIZURE WARRANT FROM A)
CRYPTOCURRENCY ACCOUNT IN THE)
(FULL) NAME OF GUANGHUA ZHENG;)
USERNAME: zhengfujing@[redacted].cn,)
)
Defendant.) NOTICE OF FORFEITURE

To: Guanghua Zheng

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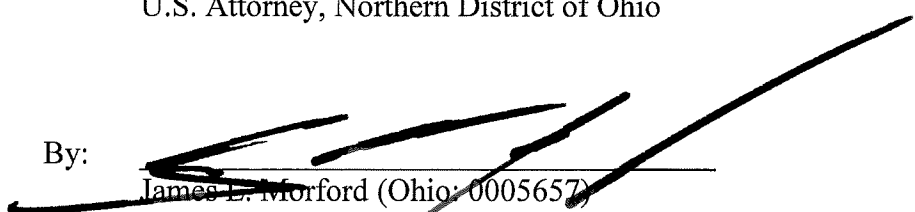
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James.Morford@usdoj.gov

Attorney for Plaintiff, United States of America

Date: September 14, 2018